

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

TONI HURT,)	
)	
Plaintiff,)	Civil Action No.: 4:17-cv-01075-RBH
)	
vs.)	
)	
ELLIOTT REALTY, INCORPORATED; RBG)	
F FARMS, LLC; JONES AND ROBERTS)	
REALTY AND DEVELOPMENT, LLC; and)	
CITY OF NORTH MYRTLE BEACH,)	
)	
Defendants.)	
)	
RBG FARMS, LLC,)	
)	
Third-Party Plaintiff,)	
)	
vs.)	
)	
LINDSEY BLEVINS PANNELL,)	
)	
Third-Party Defendant.)	
)	

**CONSENT ORDER REGARDING RBG FARMS, LLC'S AND ELLIOTT REALTY,
INC.'S RESPONSES TO PLAINTIFF'S WRITTEN DISCOVERY REQUESTS**

THIS MATTER comes before the Court upon Plaintiff's objection to Defendants RBG Farms, LLC's and Elliott Realty, Inc.'s (collectively, "Defendants") responses and objections to Plaintiff's Interrogatories and Requests for Production. The parties' counsel convened on August 29, 2018 for an informal telephone conference with Judge Harwell to discuss and attempt to resolve the dispute. Pursuant to that conference, the parties hereby agree as follows:

1. Defendants will submit supplemental responses that remove any preliminary and/or general objections and include only specific objections to individual interrogatories and requests for production.
2. Defendants have agreed to include a statement in their respective supplemental responses indicating that no documents created before the date this lawsuit was filed have been withheld on the basis of privilege.
3. Defendants are not required to create a privilege log for any correspondence protected by the attorney client privilege and/or for documents or information protected by the work product doctrine that were created or obtained on or after the date this lawsuit was filed.
4. With respect to Plaintiff's Interrogatory 15, Defendants each agree to provide a monetary dollar amount of its respective net worth within ten (10) days after the Court's ruling on RBG Farms, LLC's Motion for Summary Judgment, should the motion be denied. This information will be provided under a protective order that will protect the confidentiality of same. Defendants will not be required to produce any further documentation supporting their stated net worth numbers. At that time, and if necessary, Plaintiff may then conduct additional discovery including written discovery and depositions solely on the issue of net worth and the calculation thereof irrespective of this Court's scheduling order. If individuals have already been deposed they may be re-deposed as to this issue only, if necessary.

IT IS SO ORDERED.

August 31, 2018
Florence, South Carolina

s/ R. Bryan Harwell
R. Bryan Harwell
United States District Judge

WE CONSENT:

PHELPS DUNBAR LLP

/s/ Kevin M. O'Brien

Kevin M. O'Brien
PHELPS DUNBAR LLP
D.S.C. Federal Court ID: 100968
kevin.obrien@phelps.com
GlenLake One
4140 ParkLake Avenue, Suite 100
Raleigh, North Carolina 27612-3723
Telephone: 919-789-5300
Facsimile: 919-789-5301

Attorney for Defendant RBG Farms, LLC

ANASTOPOULO LAW FIRM LLC

/s/ Roy T. Willey IV

Roy T. Willey IV
roy@akimlawfirm.com
32 Ann Street
Charleston, South Carolina 29403
Telephone: 843-614-8888
Facsimile: 843-853-2291
Attorney for Plaintiff Toni Hurt

McANGUS GOODELOCK
AND COURIE

/s/ Dominic Allen Starr

Dominic Allen Starr
D.S.C. Federal Court ID: 06025
Dominic.starr@mglaw.com
Post Office Box 1349
Myrtle Beach, South Carolina 29578
Telephone: (843) 848-6000

Attorney for Elliott Realty, Inc.